

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

STORCH AMINI & MUNVES PC
Steven G. Storch (SS 5241)
Matthew Kane (MK 9645)
2 Grand Central Tower
140 East 45th Street, 25th Floor
New York, New York 10017
(212) 490-4100
Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILAGROS IMPORTS LIMITED, a
New York Corporation,

Plaintiff,

v.

PROGRESS VANTAGE LIMITED,
A Foreign corporation,

Defendant.

MEMO ENDORSED

*The motion to withdraw (Not No. 72)
is GRANTED. Mr. Storch & Kane
can type order on Progress Vantage.*

SO ORDERED:

[Signature]
Hon. Andrew Jay Peck
United States Magistrate Judge

07-CV-3215 (SHS)

**NOTICE OF RENEWED
MOTION BY
STORCH AMINI & MUNVES PC
TO WITHDRAW AS COUNSEL
TO DEFENDANT**

BY FAX

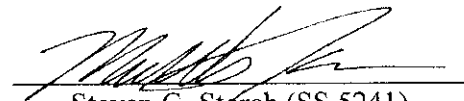
PLEASE TAKE NOTICE that the undersigned counsel hereby renews its
Motion to Withdraw as Counsel to Defendant, filed at 07-CV-3215 Docket No. 64
(October 30, 2009), and will, upon the annexed Declaration of Steven G. Storch, dated
November 18, 2009 and the accompanying memorandum of law, move this Court at a
date and time to be set by the Court, at the United States Courthouse, 500 Pearl Street,
New York, New York, for:

1. An Order allowing the undersigned to withdraw as counsel of record for
defendant Progress Vantage Limited pursuant to Local Civil Rule 1.4 and DR
2-110. [22 NYCRR § 1200.15];

2. An Order granting the stay of all pending discovery for 30 days to allow
defendant Progress Vantage to retain new counsel; and
3. Such other and further relief as the Court deems proper and just.

Dated: November 18, 2009
New York, New York

STORCH AMINI & MUNVES PC



Steven G. Storch (SS 5241)

Matthew Kane (MK 9645)

2 Grand Central Tower
140 East 45th Street, 25th Floor
New York, New York 10017
(212) 490-4100
Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Matthew Kane, hereby certify that on November 18, 2009, I electronically filed the foregoing (1) Notice of Renewed Motion by Storch Amini & Munves to Withdraw as Counsel to Defendant; (2) Memorandum of Law in Support of Renewed Motion to Withdraw as Counsel to Defendant; and (3) Declaration of Steven G. Storch in Support of Renewed Motion to Withdraw, using the CM/ECF system, which will send notification of such filing to counsel of record. I also caused a copy to be served by electronic mail and FedEx upon the following:

Wai Wong
Progress Vantage Ltd
Unit E, 13/F, Southeast Industrial Building
611-619 Castle Peak Road
Tsuen Wan, N.T.
HONG KONG
wwong@goddess-hk.com


Matthew Kane

FAX TRANSMITTAL SHEET



**ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

Southern District of New York
United States Courthouse
500 Pearl Street, Room 1370
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933
Telephone No.: (212) 805-0036

Dated: November 20, 2009

Total Number of Pages: 4

TO	FAX NUMBER
Daniel S. Moretti, Esq.	212-238-4848
Vanessa Soriano Power, Esq.	206-386-7500
Steven Gary Storch, Esq. Matthew Kane, Esq.	212-490-4208

TRANSCRIPTION:

MEMO ENDORSED 11/20/09

The motion to withdraw (Dkt. No. 72) is GRANTED. Mr. Storch is to serve a copy of this Order on Progress Vantage.